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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSE ALBERTO DIMAS-CAMPOS,  
Defendant.

CASE NO. 2:22-cr-00139-JAM

**STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
AND ORDER**

DATE: September 26, 2023  
TIME: 9:00 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

1. By previous order, this matter was set for status on September 26, 2023.
2. By this stipulation, defendants now move to continue the status conference until **November 28, 2023, at 09:00 a.m.**, and to exclude time between September 26, 2023, and November 28, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has tendered discovery pursuant to a protective order. These discovery materials include videos of controlled purchases.
  - b) Defense Counsel requests additional time to review the discovery materials and charges, conduct investigation, research related to the charges, to review and copy the discovery already tendered, to assess the viability of any pretrial motions, and arrange for in-person visits to discuss potential resolutions with their client.

1 c) Defense Counsel believes that failure to grant the above-requested continuance  
2 would deny them the reasonable time necessary for effective preparation, taking into account the  
3 exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the  
6 case as requested outweigh the interest of the public and the defendant in a trial within the date  
7 prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
9 *et seq.*, within which trial must commence, the time period of September 26, 2023 to November  
10 28, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local  
11 Code T4] because it results from a continuance granted by the Court at defendant's request on  
12 the basis of the Court's finding that the ends of justice served by taking such action outweigh the  
13 best interest of the public and the defendant in a speedy trial.

14 **[CONTINUED ON NEXT PAGE]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 21, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ ROBERT C. ABENDROTH  
ROBERT C. ABENDROTH  
Assistant United States Attorney

Dated: September 21, 2023

/s/ CLEMENTE M. JIMENEZ  
CLEMENTE M. JIMENEZ  
Counsel for Defendant  
JOSE ALBERTO DIMAS-CAMPOS

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: September 21, 2023

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE